

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW HAMPSHIRE**

**UNITED STATES OF AMERICA**

**v.**

**TOSATTI PADMORE,**

**Defendant.**

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**Criminal Case No. 12-cr-61-PB**

**SUPERCEDING INDICTMENT**

**The Grand Jury charges:**

**COUNT ONE**

**21 U.S.C. § 841(a)(1)**

**Distribution of Oxycodone**

On or about July 19, 2011, in the District of New Hampshire, the defendant,

**TOSATTI PADMORE,**

did knowingly and intentionally distribute oxycodone, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

**COUNT TWO**  
**21 U.S.C. § 841(a)(1)**  
**Distribution of Oxycodone**

On or about August 2, 2011, in the District of New Hampshire, the defendant,

**TOSATTI PADMORE,**

did knowingly and intentionally distribute oxycodone, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

**COUNT THREE**  
**21 U.S.C. § 841(a)(1)**  
**Distribution of Oxycodone**

On or about January 4, 2012, in the District of New Hampshire, the defendant,

**TOSATTI PADMORE,**

did knowingly and intentionally distribute oxycodone, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

**COUNT FOUR**  
**21 U.S.C. § 841(a)(1)**  
**Distribution of Oxycodone**

On or about January 11, 2012, in the District of New Hampshire, the defendant,

**TOSATTI PADMORE,**

did knowingly and intentionally distribute oxycodone, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

**COUNT FIVE**  
**21 U.S.C. § 841(a)(1)**  
**Distribution of Oxycodone**

On or about January 30, 2012, in the District of New Hampshire, the defendant,

**TOSATTI PADMORE,**

did knowingly and intentionally distribute oxycodone, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

**COUNT SIX**

**18 U.S.C. § 924(c)**

**Possession of a Firearm in Furtherance of a Drug Trafficking Offense**

On or about February 2, 2012, in the District of New Hampshire, the defendant,

**TOSATTI PADMORE,**

did knowingly possess a firearm, that is a Magnum Research Corporation Micro Desert Eagle .380 semi automatic (Serial Number ME04656), in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, that is distribution of a controlled substance, oxycodone, contrary to Title 21, United States Code, 841(a)(1), in violation of Title 18, United States Code, Section 924(c)(1)(A).

**COUNT SEVEN**  
**18 U.S.C. §§ 922 and 924(a)(2)**  
**Unlawful Possession of a Firearm**

On or about February 2, 2012, in the District of New Hampshire, the defendant,

**TOSATTI PADMORE**

having been convicted of a crime punishable by imprisonment for a term exceeding one year –

i.e., Assault by Prisoners, in violation of New Hampshire Revised Statutes Annotated 642:9 on or

about June 28, 2007, Case No. 06-S-1046 and Reckless Conduct, in violation of New Hampshire

Revised Statutes Annotated 631:3 on or about July 26, 2006, Case No. 06-S-138, both in the

State of New Hampshire Superior Court for Hillsborough County (North. Division) – did

knowingly possess, in and affecting commerce, a firearm – i.e., a Magnum Research Corporation

Micro Desert Eagle .380 semi automatic (Serial Number ME04656) – which had been shipped

and transported in interstate commerce, in violation of Title 18, United States Code, Sections

922(g) and 924(a)(2).

Dated: June 13, 2012

A TRUE BILL

/s/ Foreperson  
Foreperson

JOHN P. KACAVAS  
United States Attorney

By: /s/ William E. Morse  
William E. Morse  
Assistant United States Attorney  
District of New Hampshire